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November 25, 2013

**VIA ECF & FACSIMILE**

Honorable Cheryl L. Pollak  
United States Magistrate Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Ambrose v. The Mount Sinai Hospital, et al.  
11 Civ. 2026 (KAM) (CLP)

Dear Judge Pollak:

On behalf of our clients, The Mount Sinai Hospital ("Mount Sinai") and Maxine Shepherd ("Shepherd") (collectively "Defendants"), I write to request an extension of the Court's deadline for the completion of all depositions in this case from "mid-December" to February 28, 2014. The reason for this request is that (i) I am currently involved in a litigation where the plaintiff noticed approximately 15 depositions to be completed prior to a discovery cutoff deadline of November 29, 2013, which may be extended to January 14, 2014, in order to accommodate the scheduling of these depositions (*Leena Varughese v. Mount Sinai Medical Center, et al.*, 12 Civ. 8812 (CM) (JCF)); (ii) during the weeks of December 9 and December 16, I will be at mediations scheduled in Springfield, Massachusetts and Washington D.C.; and (iii) I anticipate that the parties will not conduct depositions during the weeks of the Christmas and New Year's holiday. Accordingly, a deadline of February 28, 2014 should provide enough time for the parties to conduct the depositions of Plaintiff, Shepherd and Tanya Isaacs.

My colleague, Julie Sauer, communicated with Plaintiff's counsel, Ian Wallace, and Plaintiff only consents to an extension of time until January 31, 2014.

Respectfully submitted,



Rory J. McEvoy

cc: Ian F. Wallace (via facsimile & ECF)  
Attorney for Plaintiff

*Request for extension  
until January 31  
is granted.*

*Conference set  
for  
2/7 at 300  
So Ordered -*

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*CHERYL POLLAK  
USDC  
11/25/13*